

**REMARKS**

This paper is responsive to the Office Action mailed January 11, 2007. Claims 5-14, 16-18 and 20-24 are pending in the above-identified application. Claim 5 has been amended to include an omitted comma. Reconsideration of the claims in view of the following remarks is respectfully requested.

Claim Rejections Under 35 U.S.C. § 102

Claims 5-11, 13, 14, 16-18 and 22-24 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,405,033 issued to *Kennedy*. Without conceding the merits of the rejection, Applicants respectfully submit that the rejection is overcome.

Claim 5 recites a "universal interface for accessing one or more information systems from a user device." The universal interface includes an input converter, an interface control module, a speech-to-text routing switch, an output switch and a text-to-speech converter. The input converter converts "voice or tone inputs from the user device to commands." The interface control module performs the following steps "receiving the commands from the input converter; determining one of the information systems to be accessed; converting the commands to commands recognizable by the information system; forwarding the converted commands to the information system; receiving data from the information system; and detecting the form of the data received from the information system, including whether the data received from the information system is speech or text data." The speech-to-text routing switch receives "data from the information system and control data from the interface control module." The output switch "[receives] speech from the speech-to-text routing switch, [receives] a control input from the interface control module, and [forwards] speech from the speech-to-text routing switch to the user device. The text-to-speech converter "[receives] text from the interface control module, [converts] the text to speech, and [forwards] the speech to the output switch to deliver the speech to the user device."

In contrast, *Kennedy* teaches communication over a communication network using a programmable user interface. (Column 1, lines 51-52) A call is routed from a mobile

unit to a selected service center. A service message is generated at a mobile unit and communicated in a call using a voice network. One of the service centers is selected in response to the service message. A communication session is then established between the mobile unit and the selected service center using the voice network. (Column 1, line 66 - column 2, line 6)  
An interactive voice response (IVR) unit includes software and hardware components that interact with a processor to execute voice recognition software. An operator of a mobile unit may activate an IVR unit to navigate through multiple levels of menu options associated with menu structures by using voice recognition techniques. The operator issues verbal commands to scroll through and select particular menu options. (Column 7, lines 31-39)

Neither *Kennedy* nor any of the other cited references, alone or in combination, teach all of the features recited in independent claim 5. Specifically, *Kennedy* does not teach an output switch that "receives speech from the speech-to-text routing switch, receives a control input from the interface control module, and forwards speech from the speech-to-text routing switch to the user device." Nor does *Kennedy* teach a text-to-speech converter that "receives text from the interface control module, converts the text to speech, and forwards the speech to the output switch to deliver the speech to the user device." For at least these reasons, claim 5 is allowable over the cited art, as are claims 6-11, 13, 14, 16-18 and 22-24, which depend from claim 5.

In view of the foregoing, withdrawal of the rejection of claims 5-11, 13, 14, 16-18 and 22-24 under 35 U.S.C. 102(e) is respectfully requested.

#### Claim Rejections Under 35 U.S.C. § 103

Claims 12, 20, 21 and 23 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Kennedy*. Without conceding the merits of the rejection, Applicants respectfully submit that the rejection is overcome.

Claims 12, 20, 21 and 23 depend from claim 5 (either directly or indirectly). The rejection of claims 12, 20, 21 and 23 is premised on the assertion that *Kennedy* discloses the

features recited in claim 5, and the Examiner takes Official Notice that the features of claims 12, 20, 21 and 23 would be obvious to one of ordinary skill in the art.

As discussed above, however, *Kennedy* does not disclose or suggest all features recited in claim 1. Without conceding that the features of claims 12, 20, 21 and 23 could be considered obvious to one of ordinary skill in the art, the Examiner's Official Notice does not provide any teaching or suggestion that would remedy this deficiency. Therefore, the rejection is based on a flawed premise and cannot be maintained.

Accordingly, Applicants respectfully request withdrawal of the rejection of claims 12, 20, 21 and 23.

### CONCLUSION

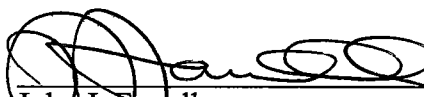
In view of the foregoing, Applicants believe all claims now pending in this application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 206-467-9600.

Respectfully submitted,

Date

3/27/07

  
John J. Farrell  
Reg. No. 57,291

TOWNSEND and TOWNSEND and CREW LLP  
Two Embarcadero Center, Eighth Floor  
San Francisco, California 94111-3834  
206-467-9600 Telephone  
415-576-0300 Facsimile

JJF:clm

60989197 v1